









# Planning guide for primary schools

NEU/GMB/Unison/Unite Commentary and checklist





This joint commentary and checklist follows the structure of the DfE Planning Guide and will assist reps in challenging what is being unrealistically expected of school leaders. The guide sets out that school leaders should work closely with unions, staff and parents when developing their plans.

We are aware that the vast majority of head teachers share our concerns about the rush to expand opening on this scale. Our intention is not to make life more difficult but rather to provide material which will assist in putting forward arguments to local authorities and trusts about why these plans are premature.

This checklist is based on current Government and public advice and is intended to help ensure that employers meet their duties to assess risks and take steps to remove or control them. As the science develops, it will be kept under review and may be revised.

We have major concerns about the <u>Department</u> <u>for Education (DfE) Planning Guide for Primary Schools</u> which is aimed at helping head teachers to prepare for wider reopening of their school.

Implementing the steps as suggested is likely to be a huge and wholly unrealistic task for school leaders, who are under massive pressure, and impossible to accomplish in a way which will reassure staff that their health and safety, and that of the children, will be protected.

Current proposals to substantially expand primary school opening from 1 June present an unacceptable risk. School staff will not be protected by social distancing rules nor, in most cases, will they be offered any personal protective equipment (PPE).

Fifteen very young children in a class means that classrooms of four- and five-year olds could become sources of Covid-19 transmission and spread. While we know that children generally have mild symptoms, we do not know enough about whether they can transmit the disease to adults so do not think that Government should be posing this level of risk to our society.

Given that the science does not yet show that children do not transmit the virus, we believe that schools should operate in the same way as other workplaces and maintain social distancing in classrooms and in movement around the school.

This means that leaders must determine the numbers of pupils they admit according to maintaining social distancing of 2 metres between pupils and between pupils and school staff. The number of children in each class must be calculated accordingly. In most classrooms this will mean fewer than 15 children present at one time. It is for school leaders to make this decision, to keep their staff, their pupils, their families and their communities, safe.

The Government needs to step back from 1 June and work with the education unions to create the conditions for a safe return to schools based on the principles and tests set out below:

- Safety and welfare of pupils and staff as the paramount principle.
- No increase in pupil numbers until full rollout of a national test and trace scheme.
- A national Covid-19 education taskforce with Government, unions and education stakeholders to agree statutory guidance for safe reopening of schools.
- Consideration of the specific needs of vulnerable students and families facing economic disadvantage.
- Additional resources for enhanced school cleaning, PPE and risk assessments.
- Local autonomy to close schools where testing indicates clusters of new Covid-19 cases.

The DfE does specifically say that it has not written the toolkit with special schools in mind but advice for this sector is included in our joint union commentary.

Questions for reps to ask are suggested. If satisfactory answers are not forthcoming in all areas, then it will not be feasible or safe to extend opening until concerns are met. There is a checklist of these questions on the next page for you to use – but please read all the supplementary advice and questions in the rest of the document before you decide whether to answer Yes or No to each of them.

## What the DfE says about the role of local authorities and trusts in respect of extended opening

The document sets out that head teachers should confirm their extended opening plans with relevant bodies (the local authority (LA) or trust), particularly their risk assessment, and consult with mayoral offices where relevant. It is also important to consult with the governing body which in some cases may be the employer.

### Our advice to reps

This is the wrong way round and not acceptable. The starting point should be that the LA or trust, as employer, provides a union-agreed risk assessment template and training for school leaders on how to adapt it to the circumstances of the individual school.

Health and safety reps have the legal right to be consulted on the risk assessment and future amendments. Also required is a reporting system to be in place to allow staff to urgently alert school leaders to any shortcomings in arrangements or where systems aren't functioning as they should be.

Also note that every school is unique and, whilst there will be many common features, each will need to consider any additional relevant risk factors beyond what is set out in this joint commentary and checklist. This will include when a high incidence of infections develops in a particular area.



## Summary of checklist questions for reps to answer

#### **Overall**

## Have you been consulted on the risk assessment for extended opening of your school?

Are you satisfied that it addresses all key issues?





### Step 1 Preparing the Site

### **Health and Safety Check of the Building**

Are you satisfied that these checks will be complied with in time for extended opening?





### Cleaning and hygiene

Are you satisfied with the cleaning and hygiene arrangements that will operate from when extended opening begins?





### Movement around the school to reduce contact

Are you satisfied that staff and children will be able to move safely through the corridors and up and down stairs from the date when the school opens more widely?





#### **Site Examination**

Are you satisfied that these arrangements will be in place in time for extended opening and they will work on a practical level?





### Step 2

### Reviewing staff for availability in school

#### **Audit of staff**

Are you satisfied that safe staffing levels will be in place from when the school starts to open more widely?





### If there is no head/deputy, DSL, SENCO, caretaker/cleaning staff available

Will the school close if any of these key staff are unavailable? If not, are you satisfied that a safe environment can be maintained from when the school starts to open more widely?





### Step 3

### Familiarise yourself with the maximum safe group size

Are you satisfied that adequate arrangements for group sizes, social distancing and PPE where necessary will be in place when extended opening begins?





#### Step 4

### Creating and staffing your temporary teaching groups

Are you satisfied that the arrangements to operate from when the school opens more widely are safe and fair and will be acceptable to both teachers and teaching assistants/LSAs?





### **Practical steps to reduce risk**

Are you satisfied that these issues have been resolved to your satisfaction in time for the start of extended opening?



### Step 6

### External support for SEND and behaviour

Are you satisfied that these issues have been considered and that measures covering these areas will be in place in time for extended opening?



### Step 7

### Changes to routines for staff and pupils

Are you satisfied that these issues have been adequately addressed before extended opening begins?



### Step 8

### **Communicating with staff**

Are you satisfied that this issue has been adequately addressed before extended opening begins?



#### Step 9

### **Communicating with parents**

Are you satisfied that parents are aware of what is expected of them?



### Step 10

### Managing pupil and staff wellbeing and mental health

Are you satisfied that appropriate measures will be in place when the school begins to open more widely?



### Step 11

### Planning what to teach and how

Are you satisfied that these issues will be adequately addressed by the time extended opening begins?



### Step 12

### Remote education during wider opening

Are you satisfied that the school will be able to operate on both levels with the staffing available and without increasing the pressure on staff, when extended opening begins?



### **Questions for reps to ask**

## **Step 1 Preparing the Site**

#### **Health and Safety Check of the Building**

<u>DfE guidance</u> sets out checks that need to take place for schools that have been entirely closed.

#### Questions for reps to ask:

Has this document been consulted by management and confirmation given to you that each of these points will be addressed in advance of reopening for schools that have been entirely closed, and that assurances will be given in writing about the safety of the following areas?

- hot and cold water systems
- gas safety
- fire safety
- kitchen equipment
- Specialist equipment used by pupils (eg for access/mobility/changing)
- security including access control and intruder alarm systems
- ventilation

Are you satisfied that these checks will be complied with in time for extended opening?



#### Cleaning and hygiene

The DfE tells head teachers that they will want to make clear to school staff and parents what their 'expectations' are about cleaning and hygiene. It suggests that they 'may wish to consider plans' for the following:

- The availability of soap and hot water in every toilet and any areas used for personal care of pupils eg changing (and if possible in classrooms).
- The location of hand sanitiser stations, for example at the school entrance for pupils and any other person passing into the school to use, and their replenishment.
- The location of lidded bins in classrooms and in other key locations around the site for the disposal of tissues and any other potentially infected waste, their double bagging and emptying.
- Ensuring you have a good supply of disposable tissues in each classroom and enough to top up regularly, as well as lidded bins with double bagging for disposal, with any other potentially infected waste, and where these should be located.

#### Questions for reps to ask:

Reps need assurances about the systems that the head teacher will be able to implement. Without these assurances there can be no 'expectations' on either staff or parents.

- Will soap and, preferably warm, water be available at all times, with systems in place to ensure continuity of supply of soap and sanitiser?
- How will the school ensure that children and staff arriving can safely queue up, at 2-metre distance from each other, to access the sanitiser on arrival?
- Will staffing levels (and PPE) allow for enough staff to support those pupils in special schools to do this who are unable to do it independently?
- Are lidded bins available in every classroom? Unless operated by pedal, the lids will need to be regularly sanitised throughout the day. How will this happen? Who will empty them during the day?
- What arrangements are in place to keep every classroom supplied with tissues?
- Will staff and children wash their hands for at least 20 seconds with water and soap on arrival, before departure and regularly throughout the day, including before and after every break and lunchtime, and how will this be supervised and monitored?
- Will pupils be regularly reminded to catch coughs and sneezes with a tissue or elbow?
- Will appropriate PPE be provided in schools where pupils are unable, or less able to catch their sneezes and coughs?
- Will hand dryers be disconnected and replaced with paper towels and bins?
- Will drinking fountains be taken out of use?
- Will only rooms with windows that can be kept open be used?
- Will doors be kept open where possible to aid ventilation?

- Will separate risk assessments take place in classes where leaving a door open will expose children to additional risks (eg runners)?
- Will air conditioning systems not be used unless it can be confirmed that there is no additional risk?
- Will all areas of the premises be thoroughly cleaned on a daily basis with particular focus on surfaces that are touched by multiple people such as photocopiers, door handles, table/counter tops, computers including mouse and keyboard, light switches telephones, chairs, bannisters, shared learning resources or toys, specialist equipment for SEND pupils, toilets and toilet handles, sinks, taps and other areas touched regularly, with additional cleaning during the day as necessary?
- Will each classroom be provided with gloves and disinfectant spray in case a pupil coughs or sneezes on a piece of equipment?
- Is there capacity amongst the cleaning staff to meet these requirements?

Are you satisfied with the cleaning and hygiene arrangements that will operate from when extended opening begins?





#### Movement around the school

### The main suggestion from DfE is for corridors to be used on a one-way basis.

#### Questions for reps to ask:

- Will a one-way system be introduced? If not, why is it not needed?
- What arrangements are proposed for safe movement on staircases?
- What arrangements are in place for use of lifts – can social distancing be achieved if a staff member travels in the lift with a child?
- How will staff and children be made aware of the new arrangements, with particular reference to very young children and those with special needs?
- Who will monitor that the systems are being complied with? Will a member of staff be on duty at all times?
- Are other measures needed in corridors, for example floor markings or removal of furniture or students walking in single file without holding hands?
- Is there provision for the movement of pupils around the school who may need additional assistance from an adult?
- How will pupils and staff keep 2-metres apart, even with these arrangements?
- What arrangements are proposed around access to pupil toilets to ensure no overcrowding during lesson and break times?
- What signage will be displayed to support these new systems?

Are you satisfied that staff and children will be able to move safely through the corridors and up and down stairs from the date when the school opens more widely?





#### **Site Examination**

Head teachers are advised to examine the classrooms available and any other rooms that can be used as temporary classrooms. The DfE suggests that essential resources may need to be moved from one classroom to another where classes are split and that non washable resources, other than books, should be taken away or put out of reach.

#### Questions for reps to ask:

- Given that classes will be split, how in practical terms can resources be split between two classrooms?
- Will additional resources be needed to ensure that both classes have what they need?
- How will young children be taught (reception especially and nursery) without physical resources?

Are you satisfied that these arrangements will be in place in time for extended opening and that they will work on a practical level?





### Reviewing staff for availability in school

#### **Audit of staff**

The DfE is asking head teachers to undertake an audit of how many staff are available, both teaching and support staff.

#### Questions for reps to ask:

- Are you satisfied with the proposed rota arrangements?
- Have you been given an assurance that there will always be a head/deputy, first aider, Designated Safeguarding Lead (DSL), SENCO, caretaker and sufficient cleaning staff on duty at all times?
- Are you satisfied that consistency can be ensured to minimise staff movement between classes?
- Has it been confirmed that sufficient cleaning staff will be engaged to allow for the enhanced cleaning levels required?
- Have you been given an assurance that non cleaning staff will not be expected to undertake cleaning work?
- Has the site been measured to ascertain what the maximum capacity is and proportion of pupils that can be accommodated to allow safe distancing? (This needs to adopt a cautious approach in relation to staff availability, taking into account those who must work from home because they are vulnerable or may need to self-isolate and likely future levels of absence.)
- Is it clear to all staff and parents that only healthy staff and pupils who are not exhibiting symptoms, and who do not need to self-isolate, may attend school?
- Is it clear that pregnant staff and those with underlying health conditions that make them vulnerable, or who live with or care for vulnerable or shielding household members

or those over age of 70 are permitted to continue to work from home? The DfE advises that if 'vulnerable' as opposed to 'extremely vulnerable' staff cannot work from home 'they should be offered the safest available on-site roles', also that a member of staff who lives with someone who is vulnerable can attend work. The joint unions disagree, both should be allowed to work from home.

- Have the risks to Black staff been assessed when planning rotas? Evidence from the Office for National Statistics shows a greater impact of Covid-19 on Black communities with a disproportionate number of deaths being recorded. The DfE Planning Guide does not address this issue.
- Will parents be advised that the school cannot guarantee to be able to keep their children socially distant, with support for parents to assess the risks to themselves and other family members of sending their child to school?
- What arrangements are in place for safe induction of new staff during this period?
- Have catering staff been involved in discussions about how meals will be served and are there sufficient catering and lunchtime supervision staff to ensure that children can safely eat their lunch?
- Is there a procedure to close the school or college at short notice if staffing levels fall to levels where safety cannot be assured?

Are you satisfied that safe staffing levels will be in place from when the school starts to open more widely?





## If there is no head teacher/deputy head teacher, DSL, SENCO, caretaker/adequate numbers of cleaning staff available

Questions for reps to ask:

■ Will the school close if any of these key staff are unavailable?

If not, are you satisfied that a safe environment can be maintained from when the school starts to open more widely?





## Familiarise yourself with the maximum safe group size

The Planning Guide is explicit that 'unlike older children and adults, early years and primary age children cannot be expected to remain 2 metres apart from each other and staff'.

Are you satisfied that adequate arrangements for group sizes, social distancing and PPE where necessary will be in place when extended opening begins?





#### Questions for reps to ask:

- Given that social distancing is expected in all other areas of society, it is unacceptable that the Government expects schools to open without the protections that are recommended for other environments, eg shops and public transport. What is proposed to address this issue?
- Where there is a risk of airborne contamination, because social distancing cannot easily be adhered to, particularly where staff are at risk from spitting or biting and where pupils are unable to catch or control coughs and sneezes, the joint unions believe that PPE must be provided and training given on its use and disposal. Will this happen?
- Will PPE be available for emergency situations, for example when a pupil develops symptoms during the school day and is awaiting collection?
- What assurances can be given about secure arrangements for sourcing PPE?
- Can confirmation be given that, if any member of staff wishes to wear a face covering, they will not be prevented from doing so?

## Creating and staffing your temporary teaching groups

The DfE advises that the next step is to work out how to accommodate the eligible pupils, should they all come to school, calculating for a maximum group size of 15 in mainstream and assuming that all children will come every day for the whole day and that teaching assistants will be allocated to lead a group if there is a shortage of teachers. The joint unions oppose these assumptions.

#### Questions for reps to ask:

- How many pupils can each individual classroom safely accommodate to ensure that they and staff remain 2-metres apart on entry and departure and during the lesson? This needs to take account of the additional staff numbers in classes with SEND pupils who have individual adult support. How many people altogether will be in a classroom should be the measure.
- What areas are safe to use for different purposes than usual to aid social distancing?
- Is the school proposing to have 15 children per class? The joint unions position is that staff cannot be expected to safely supervise 15 children and ensure that they socially distance.
- Has account been taken of the fact that some staff, in particular support staff, normally work at close proximity to individual pupils and how this work can continue in a safe manner?
- In special schools, given the level of adult support required for pupils, what is a safe number of people to have in a classroom and how is this determined?

- In special schools, where social distancing will be impossible, what measures are in place to protect staff and pupils?
- To what extent can parents of SEND children be reassured that their child will still be working with, or have access to, their key worker/learning support assistant?
- Is the school prepared to consider attendance on a rotational basis in order to reduce class sizes?
- Can an assurance be given that teaching assistants, unless it is part of their normal role such as for higher level teaching assistant, will not be expected to lead classes?
- Will supply teachers be brought in as necessary?
- Will senior leaders be available to cover classes if needed?
- Will parents be told not to bring their children to school if there is a shortage of staff for a particular class?

Are you satisfied that the arrangements to operate from when the school opens more widely are safe and fair and will be acceptable to both teachers, teaching assistants and learning support assistants?





### **Practical steps to reduce risk**

The DfE suggests plans to be put in place to, for example, adjust timings for the day, to reduce contact between adults and children and between children. There is little detail.

#### Questions for reps to ask:

- How does the school propose to ensure social distancing at the start and end of each school day?
- If it is planned to undertake temperature checks, how will this be managed safely in terms of social distancing between the child and member of staff and to avoid queues building up?
- What measures are in place to protect staff and pupils who may at times need to use physical interventions (in alternative provision (AP) and mainstream) to protect pupils from harming themselves or others? (They will clearly not be able to socially distance when doing this)
- In AP what measures are in place to ensure that enough appropriately trained staff are on site to support pupils with behavioural issues to keep safe? How and what PPE will be used in this situation?
- Is it practical to stagger arrival times, if so how?
- How will parents be informed and the system monitored?
- Is there sufficient staffing to monitor the safe arrival and departure of children at varying times?
- How will overcrowding at the school gates or in the playground be prevented?

- What will be expected of parents/carers in terms of social distancing and how will they be informed of arrangements?
- Will parents/carers be instructed that they may not enter the premises other than in an emergency situation?
- Will there be clear guidelines on entry to school about the procedures in place for essential visitors to the school?
- Will there be social distancing measures in place for visitors to the school?
- Will visitors working closely with pupils be offered PPE where necessary?
- How will other unauthorised visitors be kept away?
- Will enough staff be available at the beginning of the day (and able to socially distance) to assist children in coming into school where needed (younger children/children with SEND/anxiety etc)?
- How will break times operate to ensure social distancing?
- What will happen in wet weather at break and lunchtimes?
- What arrangements are in place to ensure that meals can be safely prepared and served?
- How many separate lunch sittings will be needed to ensure social distancing and is sufficient staffing in place to manage this, even where someone may be absent?
- Have families been told to provide water bottles?
- How will breaks for staff operate?

- Have assemblies and the coming together of other large groups, both staff and pupils, been suspended
- Is there a system in place for isolating children who develop symptoms during the day, while they wait to be picked up?
- Will all staff be sent home as soon as they report symptoms during the school day and will arrangements be in place to provide cover as necessary?
- Have off site visits been suspended?
- What are the plans for ensuring that staff can travel safely to and from school?

- For those who have no car and cannot walk or cycle, how can they safely travel to school, when use of public transport is discouraged? (note: car sharing other than between members of the same household should not happen). A safe travel plan for each individual member of staff need to be agreed.
- Where school transport operates under normal circumstances, how will this operate at this time, ensuring social distancing and hygiene arrangements?

Are you satisfied that these issues have been resolved to your satisfaction in time for the start of extended opening?





### **External Support for SEND and Behaviour**

The DfE advises that where normal external support services may not be available from the local authority schools should consider different arrangements and consider using alternative organisations for support.

The Coronavirus Act 2020 has temporarily (until 25 September) changed the law on EHC plans meaning that local authorities now no longer have a duty to secure educational provision in accordance with the education, health and care (EHC) plan. Instead they now have a duty to use their 'best endeavours' to do so. This is likely to mean that there is an increased pressure on schools to fill the gap. The DfE guidance on the changes regarding EHC plans is here.

- Questions for reps to ask:
- Will individual risk assessments and discussion with parents/carers have taken place and been agreed by the date when extended opening begins, to ensure that any provision required by a child in order to attend school is safely in place?
- Where LAs cannot, despite 'best endeavours' provide the support listed in an EHC plan can pupil safety in school be guaranteed? Eg behaviour support.
- Will there be clear guidelines on entry to school about the procedures in place for essential visitors from external agencies visiting pupils at the school (eg educational psychologists, child and adult mental health services (CAMHS), behavioural support, advisory teachers etc)?

- Will there be social distancing measures in place for visitors from external support agencies visiting pupils at school?
- Will visitors working closely with pupils be offered PPE where necessary?
- If LAs cannot provide additional trauma support for pupils can another provider be quality assured and risk assessed in time for when the school beings to open more widely?

Are you satisfied that these issues have been considered and that measures covering these areas will be in place in time for extended opening.





### Changes to routines for staff and pupils

The DfE advises about regularly and rigorously reinforcing new rules and behaviour, for example in relation to who is allowed on site and in relation to, for example, taking books home.

#### Questions for reps to ask:

- Will guidance and training be provided for staff to ensure they understand, and can enforce, the new routines and support pupils in understanding them and are familiar with revised physical arrangements, well in advance on when wider opening begins?
- Will individual pupil risk assessments be in place for all pupils who exhibit anti-social behaviour, eg biting, before a decision is made about admitting them under the new arrangements?
- Will compassionate and proportionate behaviour policies that protect health and safety, while also supporting pupils who may exhibit problematic behaviours as a response to trauma they may have experienced during lockdown, be in place by the time wider opening begins?
- It will not be safe to mark children's books during this period. Will clear instruction be given that no marking should take place and the books should not be taken to and from home/school?
- Will staff be told to wash their hands before and after handling pupils' books?
- Will library books be regularly sanitised?
- Some teaching assistants will be used to working in very close proximity to individual pupils, so how can this work continue in a safe manner?

- Have parents been informed about new arrangements for drop off and pick up routines?
- Have other regular visitors to the school, eg parent volunteers, been informed that they should not attend at this time?
- Do essential contractors, including those who deliver food, understand how they may access the premises and what precautions are expected of them while they are on site?
- Are catering staff aware of new safe working practices?

Are you satisfied that these issues have been adequately addressed before extended opening begins?





# Step 8 Communicating with staff

The planning guide recommends that on-line meetings be held before reopening and that senor staff are on hand to support staff.

#### Questions for reps to ask:

- Will senior staff be visibly present around school during the day?
- What arrangements will be put in place to ensure regular staff feedback on arrangements?

Are you satisfied with on-going communication arrangements?



# Step 9 Communicating with parents

Head teachers are advised to communicate with parents so that they know who is eligible to attend school and from when and what measures will be in place to 'make the school a low-risk place for their child'.

Are you satisfied that parents are aware of what is expected of them?



## Managing pupil and staff wellbeing and mental health

It is recognised that school closure may have caused significant mental health difficulties for some children and some may have suffered a bereavement. Staff may be similarly affected.

#### Questions for reps to ask:

- What guidance will be given to staff on how to support children?
- What pastoral support services will be available?
- Does the school recognise its duties under health and safety law to protect the mental as well as physical health of staff?
- What plans are in place to ensure that this duty is applied?
- What counselling services are available for staff and pupils who may need support?
- How will the school monitor workload at this time to ensure a reasonable work/life balance for staff?

Are you satisfied that appropriate measures will be in place when the school begins to open more widely?





### Planning what to teach and how

The DfE sets out suggestions for reintegrating pupils into new routines, including teaching and supervising health and hygiene arrangements such as handwashing, tissue disposal and toilet flushing and setting out what needs to happen in relation to the washing of resources.

#### Questions for reps to ask:

- The DfE toolkit recommends that children should be taught not to touch their faces – how can this realistically be taught or monitored?
- It is also recommended that resources for painting, sticking and cutting be washed before and after use what additional staff resources will be allocated to these tasks, given that these materials are likely to be in constant use?
- How will staff ensure that children do not share these resources?
- How will staff be supported to teach outside their usual year group/key stage responsibility?
- Has time been given for staff to work together to agree shared priorities for children's learning?

- Has time been identified for staff to work together to prepare teaching, particularly to adjust their teaching of practical lessons and of play-based curriculum without shared physical resources?
- Has support been given to teaching assistants to prepare for supporting pupils?
- How will staff maintain continuity of learning and support as pupils begin to return, but have additional periods of time away?

Are you satisfied that these issues will be adequately addressed by the time extended opening begins?





### Remote education during wider opening

It is recognised by the DfE that more staff will be needed at school when opening is extended, so it may be more difficult to maintain the same level of remote learning provision for pupils in year groups not eligible to attend.

#### Questions for reps to ask:

- What arrangements will be in place for year groups not eligible to attend?
- What arrangements will be in place for pupils with underlying health conditions who cannot attend when the rest of their year group may be in school?
- How will the senior leadership team (SLT) ensure that any change in opening arrangements does not increase workload for staff whether working at home or at school?

Are you satisfied that the school will be able to operate on both levels with the staffing available and without increasing the pressure on staff when extended opening begins?



